New-Mac Electric Cooperative, Inc.

Your Touchstone Energy℠ Partner

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Missouri Public
Service Commission

The Missouri Public Service Commission
Mr. Dale Hardy Roberts
Secretary of the Commission
P. O. Box 360
Jefferson City, Missouri 65102

December 15, 2003

Re: PSC Case No. EX-2003-0489 and EX-2003-0368

Dear Mr. Roberts:

Comments pertaining to HCSR240-3.190 were erroneously filed in Case No. EX-2003-0368 by letter dated December 7, 2003. Please disregard those previously filed comments. The comments below pertain only to Case No. EX-2003-0489.

On behalf of New-Mac Electric Cooperative, Inc., regarding the proposed amendment to HCSR 240-3.190, I would like to express our adamant opposition to the adoption of this rule. The investigation process would be both redundant and excessive resulting in poor service and increased costs to our own members.

In addition, the financial costs estimated in this proposal are inaccurate, specifically in the area of hours required to complete additional paperwork. Also, lost revenue from extended power outages, while waiting on investigations to be completed, could easily exceed the proposed costs. Who would bear the burden of these additional costs? Our members.

As for any beneficial effect, in the area of safety, for Cooperatives or their members, there are presently various regulations and numerous organizations performing the functions of monitoring and reporting accidents. Two primary examples are the Rural Utility Services' Safety Accreditation Program and the Missouri Electric Cooperative Insurance Plan's safety audits, both of which are successfully in place and funded.

Another concern for cooperatives is the fact that information from these reports could prove to be detrimental in litigation in an effort to enhance claims. This would only serve to increase insurance premiums.

In conclusion, passage of this amendment would create an unnecessary burden on cooperatives and their members while providing very little benefit to either.

Sincerely,

New-Mac Electric Cooperative, Inc.

Mark W. Stuart

Mark W. Stuart
Facility Coordinator/Safety Director

MWS/mh